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15 *Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,*
Luis Javier Vazquez, Dennis Lloyd Hallman,
16 *Brandon Vera, Pablo Garza, Gabe Ruediger,*
Mac Danzig, Kyle Kingsbury, and Darren
17 *Uyenoyama*

18
19 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
20 **SAN JOSE DIVISION**
21

22 **Cung Le, Nathan Quarry, and Jon Fitch, on**
23 **behalf of themselves and all others similarly**
situated,

24 **Plaintiffs,**

25 **v.**

26 **Zuffa, LLC, d/b/a Ultimate Fighting**
27 **Championship and UFC,**

28 **Defendant.**

Case Nos. 5:14-cv-05484-EJD, 5:14-cv-05591-EJD,
5:14-cv-05621-EJD; 5:15-cv-00521-EJD;
5:15-cv-01324-EJD

DECLARATION OF PLAINTIFF CUNG LE
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO TRANSFER VENUE

5:14-cv-05484-EJD, 5:14-cv-05591-EJD
5:14-cv-05621-EJD, 5:15-cv-00521-EJD
5:15-cv-01324-EJD

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Kyle Kingsbury and Darren Uyenoyama, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

5:14-cv-05484-EJD, 5:14-cv-05591-EJD
5:14-cv-05621-EJD, 5:15-cv-00521-EJD
5:15-cv-01324-EJD

1 I, Cung Le, declare that I am more than 18 years of age and I am competent to testify about
 2 the subjects declared herein, and that under the penalty of perjury, the following declarations are true
 3 and correct and based on my personal knowledge:

- 4 1. I am an Elite Professional MMA Fighter and proposed representative of the Bout and
 5 Identity Classes in the above-captioned matter. Along with Co-Plaintiffs Nathan
 6 Quarry and Jon Fitch, I filed the complaint in the above-captioned matter on
 7 December 16, 2014.
- 8 2. I currently reside in San Jose, California and train at the American Kickboxing
 9 Academy (“AKA”) in San Jose, California, along with several other members of the
 10 Bout and Identity Classes, including, without limitation, Jon Fitch, Cain Velasquez,
 11 Phil Baroni, and Daniel Cormier.
- 12 3. Throughout my career, I have won ten (10) championship MMA titles and am a three
 13 (3) time Bronze Medalist in the Wushu World Championships.
- 14 4. I fought nine (9) of my twelve (12) professional MMA bouts in San Jose, including
 15 “UFC 139” on November 19, 2011, at the HP Pavilion (now the “SAP Center”). I
 16 was subject to UFC bout agreements for my performance in “UFC 139.”
- 17 5. Prior to joining the UFC, I was a Fighter for the UFC’s former rival, San Jose-based
 18 Strikeforce. Of the eight (8) Strikeforce-promoted MMA bouts I competed in
 19 between March 10, 2006 and June 26, 2010, all eight (8) took place at the HP
 20 Pavilion in San Jose, California.
- 21 6. In 2011, following the UFC’s purchase of Strikeforce, I signed contractual
 22 agreements with the UFC.
- 23 7. I appeared in *EA Sports UFC*, the fourth installment of the UFC video game
 24 franchise, initially released on June 17, 2014. *EA Sports UFC* is an MMA fighting
 25 video game developed by Electronic Arts, which is based in the Northern District of
 26 California.
- 27 8. I also appeared in Round 5 action figure sets, including limited edition sets, and
 28 Topps Trading Card sets.

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1 9. My identity, including my autograph, was featured in UFC posters.

2 10. My identity was expropriated and my compensation for appearing in UFC Licensed
3 Merchandise and UFC Promotional Materials was artificially suppressed.

4 11. I was and continue to be injured as a result of the UFC's unlawful conduct.

5 12. I chose to file the above-captioned matter in this District because it was by far the
6 most convenient forum to pursue my antitrust claim. I reside with my family and
7 continue to train in this District, making it the ideal forum for me to litigate this
8 action. It would produce considerable hardship to be called to testify in an
9 alternative, out-of-state forum.

10
11 Dated: April 10, 2015

By: 

Cung Le